

June 27, 2017

AXA Equitable Life Insurance Company  
c/o Mr. Preston McFarland, Asset Manager  
Morgan Stanley Real Estate, Inc.  
3424 Peachtree Road, NE, Suite 800  
Atlanta, Georgia 30326

Re: Removal of Property from the Hazardous Site Inventory  
Former Vogue Cleaners, Tax Parcel 079/087  
4018 Washington Road, HSI # 10394  
Martinez, Columbia County

Dear Mr. McFarland:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Program (VRP) revised Compliance Status Report (CSR) dated October 25, 2016 that was submitted to delist the above site from the Hazardous Site Inventory (HSI). EPD, after completing the review of the CSR, has determined that the Vogue site property cannot be delisted at this time and has prepared the following comments:

- 1) According to the August 2016 groundwater monitoring data for the site, the concentrations of tetrachloroethene (PCE) and trichloroethene (TCE) have demonstrated an increasing trend, including a rise in concentrations as high as 19 parts per million of tetrachloroethene in MW-8R. Due to these increasing trends, please conduct an additional monitoring event at the site to support the compliance certifications for groundwater and vapor intrusion. Based on current site conditions, the monitoring should include the following:
  - a. Groundwater sampling and analysis from the previously sampled groundwater monitoring wells. They should include where possible MW-8R, MW-1, MW-4, MW-2R, MW-22, MW-12 D, MW-5, POD-1 and MW-6. Please include Boring logs for MW-8D and 12-D in the future Report and also include recovery wells on the site map.
  - b. Sub-slab soil gas, to determine if current concentrations of COCs at the site result in an exceedance of the established vapor intrusion target criteria. While it is not required at this time, EPD does recommend the collection of indoor air and ambient outdoor air samples in order to assess the current direct exposure conditions.
- 2) According to the VRP CSR compliance certification, because the concentrations of COCs at the point of demonstration (POD-1) have remained below detection limit values for four years, the site is in compliance with the VRP and can certify to Type 4 RRS with the UEC in place. However, based on the data for MW-5, which is located on what appears to be downgradient parcel 079 133, the concentration of PCE (420 ppb) is above the established RRS beyond the limits of the institutional controls for the site

property. Consequently, the following must be addressed prior to EPD's concurrence with a compliance certification for the site:

- a. Provide information documenting that delineation to Type 1 RRS has been completed to extent practicable.
- b. Identify any potentially complete exposure pathways that may exist beyond the subject site's property boundary that may be impacted by the above referenced release to groundwater, and modify any existing corrective measures and/or institutional controls as necessary.

3) According to EPD's May 30, 2014 VRP CSR Comments letter, EPD requested that the site either use MW-5 as the plume centerline point of demonstration (POD) well or re-locate the POD well based on further groundwater investigations. Please take this into consideration when evaluating the updated groundwater monitoring data and amending the VRP CSR.

4) Please note that the current concentrations in the source monitoring well and downgradient monitoring location MW-5 exceed the projected values established within the fate and transport model. Should the new monitoring indicate conditions representative of an expanding plume, an updated groundwater fate and transport model may be required to support the groundwater compliance certifications for the site property.

If you have any questions, please contact Montague McPherson at 404-657-0483.

Sincerely,

*Antoinette Beavers for Kevin Collins*

Kevin Collins  
Unit Coordinator  
Response and Remediation Program

c: Mark Mitchell, Genesis Project, Inc. (email)

File: HSI # 10394; File ID # 232-0028

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